

FILED
Clerk
District Court

MAY 10 2007

Robert D. Bradshaw
PO Box 473
1530 W. Trout Creek Road
Calder, Idaho 83808
Phone 208-245-1691

For The Northern Mariana Islands
By _____
(Deputy Clerk)

Plaintiff, Pro Se

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

ROBERT D. BRADSHAW

) Civil Action No. 05-0027

Plaintiff

v.

COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS (hereafter referred to
as the CNMI); et. al.

Defendants

) **REVISED DISCLOSURE**
) **STATEMENT, APR 30, 2007**
)
)

1. Comes plaintiff ROBERT D. BRADSHAW in Civil Case 05-0027 to file this revised disclosure as required by FRCP Rule 26.

2. Names, addresses and phones of persons who may have discoverable information:

a. Robert D. Bradshaw, PO Box 473, 1530 W. Trout Creek Road, Calder, ID 83808, phone 208-245-1691.

b. Independent Consultants, PO Box 1832, Hayden, ID 83835, Phone 208-762-8729.

c. Computerized Information Service, Inc., 910 Skokie Blvd, Suite 209, Northbrook, IL 60062, phone 847-559-9470.

d. William Smyth, PO Box 1, Laclede, ID 83841, Phone 208-263-8037.

e. Postmaster, Oldtown, ID 83822, Phone 208-437-2212.

- f. Postmaster, Elk, WA 99009, Phone 509-292-2250.
- g. Postmaster, Calder, ID 83808, phone 208-245-4483.
- h. Postmaster, Colville, WA 99114, Phone 509-684-2241.
- i. Postmaster, Spokane, WA, Phone 509-626-6860.
- j. US Dept of the Interior, Office of Insular Affairs, Washington, DC.

k. There are a number of web sites on the Internet which report many instances of alleged fraud, corruption, discrimination, etc in the CNMI (examples include William Betz (William Betz is a former Assistant Attorney General), SaipanSucks, sweat shop, freerepublic.com, goasiapacific.com, CNMI Fraud, chamorro.com, etc). Plaintiff is unsure at this time which, if any, of the owners of these sites will be asked or agree to provide evidence in this case. This disclosure will be amended once testimony is located, decided upon and made available to plaintiff.

- l. Joseph H. Race, Office of AG, Saipan, MP 96950 Phone 670-664-2312.
- m. Alfred Teregeyo, Office of AG, Saipan, MP 96950 Phone 670-664-2312.
- n. Frank Kapileo, Office of AG, Saipan, MP 96950 Phone 670-664-2312.
- o. Mr Aldan, office of AG investigations, Saipan, MP 96950, Phone 670-664-2312.
- p. Timothy Bellas, Saipan, MP 96950.
- q. Cliff Jones, Oldtown, ID 83822.
- r. Carol Dassow, 40603 N. Newport Hwy, Elk, WA 99009.
- s. Ted Mahr, Box 1443, Moses Lake, WA, phone 509-750-9793.

- t. John A Manglona, CNMI Supreme Court, Saipan, MP 96950.
- u. Pend Oreille Telephone Co, 301 Main St, Ione, WA 99139, Telephone 509-442-0082, serves Oldtown, Idaho.
- v. US West Telephone Company, Spokane, WA, serves Elk, WA.
- w. Washington Water Power/Avista Utilities, 1411 E. Mission Ave, Spokane, WA 99252, Phone 800-227-9187.
- x. Oldtown City Hall, 215 N. Washington, Oldtown Idaho, phone 208-208-437-3833.
- y. David Vanderholm, USPO, 9409 Bridges Road, Elk, WA 99009. Rural Route mail carrier for North Newport Highway, Elk, WA.
- z. Pamela Brown, Saipan, MP 96950
- aa. Diane Bergeron, Washington DC.
- bb. L. David Sosebee, Austin, Texas
- cc. William C. Bush, 1401 Ingraham St, Washington, DC 20011.
- dd. Andrew Clayton, Shanghia, China
- ee. Jay H. Sorensen, c/o Shanghai, Box 9022, Warren, MI 48090
- ff. Nicole C. Forelli, 2287 Main Street, Wailuku, HI 96793
- gg. D. Douglas Cotton, 4333 Amon Carter Blvd, MD 5675, Fort Worth, Texas 76155, Phone 214-222-3687 or 972-574-6200.
- hh. Edward Buckingham, Office of AG, Saipan, MP 96950.
- ii Robert Kingsley, 2621 2nd Ave, Apt 801, Seattle, WA 98121.
- jj. Robert Dunlap, Shreveport, LA.
- kk. Robert Bisom, Japan.

ll. Alexandro Castro, CNMI Supreme Court, Saipan. MP 96950.

mm. Steve Aver, Paralegal, 203 Nettlingham Road, Sandpoint, ID 83864,
Phone 208-265-6362.

nn. Clyde Lemons, Office of AG, Guam

oo. All present or former Assistant Attorney Generals and other former
and present CNMI lawyers are potential witnesses for Plaintiff BRADSHAW on the
CNMI corruption and gross incompetence in the AG's office and the CNMI courts.

pp. All present and former employees of the CNMI AG's office of
investigations.

qq. All secretaries and office personnel in the AG's office.

rr. George Law Office, PC, PO Box 168, Twin Falls, ID 83303.

ss. CSC Credit Services, PO Box 981221, El Paso, TX phone 800-392-
7816.

tt. US Bank, Box 6345, Fargo, ND 58125, phone 800-047-1444.

uu. Dr Wade R. Lachman, 1624 E Seltice, Post Falls, ID, Phone 208-773-
9108.

vv. The Genova Diagnostics Laboratories, 63 Zillicoa St, Asheville, NC
28801, phone 828-285-2223.

ww. Dr Timothy R. Bonine, MD, allergy specialist, 1309 Ponderosa Dr,
Suite 103, Standpoint, ID 83864, phone 208-265-9545.

3. Description by category and location of documents, data compilations and
tangible things that are or may later be in possession of the persons named above as
possibly having information:

a. Plaintiff BRADSHAW has copies of letters, correspondence and material developed from 1995 to 2005 relative to Federal case 95-0042, CNMI case 96-1320. Federal Civil Action No. 05-84-N-EJL and Federal Civil Action 05-0027. This material is available for inspection at Plaintiff's residence in Calder, Idaho or Plaintiff will copy it and send copies to applicable defendants through discovery. Plaintiff has letter of Mar 15, 2005 denying Bradshaw credit.

b. Independent Consultants is a private investigator who has information on locating the defendants in this case.

c. William Smyth is an investigator and consultant who may have some information on RICO corruption in the CNMI. Diane Bergeron is believed to have information on CNMI corruption and on alleged corruption by Justice Castro.

d. The above cited postmasters and Mr Vanderholm should have information/documents on postage delivered to plaintiff BRADSHAW in the years 1996-2005. Much of this information will have to be obtained by subpoena or through the efforts of US Postal inspectors once they can be brought in to investigate BRADSHAW's allegation of fraud and conspiracy.

e. The US Department of the Interior should have much written material on corruption, discrimination, and wrong doing in the CNMI and their follow-up investigations and inquiries into such actions.

f. Plaintiff has not yet determined specifically what documents the various web sites (on CNMI corruption) possess and/or their willingness to make such documents available to plaintiff and this court action. But this option will be fully pursued later. Once this option is pursued, this disclosure may be amended to reflect

what documents that they possess, if any, which they will make available to plaintiff and which can be used in this case. This disclosure will be appropriately amended.

g. Computerized Information Service, Inc is a consulting company which has information on locating the defendants in this case.

h. Avista Utilities has a complete record of where plaintiff Bradshaw lived and when there from 1996 to present as Avista and its predecessor Washington Water Power has supplied electrical power to Bradshaw from 1996 to present. Avista also has detailed information on customers it has served in Eastern Washington and North Idaho who have the name "Manny" or something similar. These records can be obtained by subpoena as necessary to establish that there are no such person as alleged to have receipted the certified letters allegedly sent BRADSHAW by BISOM/SORENSEN and the CNMI AG.

i. The two telephone companies have records on their customers in Elk, WA and Oldtown, Idaho in the years 1996-2002. These records can be obtained by subpoena to help prove that there was no person named Manny or anything similar in Elk or Oldtown in the applicable years involved.

j. The Oldtown City Hall has records on people living in Oldtown and receiving water service in 1998-2000. These records can be obtained by subpoena.

k. Justices Castro, Manglona, and Bellas have extensive information on case 96-1320.

l. The 5-27 defendants, Messers Mahr, George Law Office, Lemons and Buckingham, and all present and former AG personnel may have information on Federal case 95-0042, CNMI Case 96-1320, Civil Actions No. 05-84-N-EJL and 05-

0027, CNMI corruption and/or internal operations of the Attorney General's Office, to include its possibilities for gross incompetence, malpractice, etc. as allowed in the CNMI Supreme Court decision on the appeal of CNMI case 96-1320.

m. The Plaintiff BRADSHAW expects to contact by phone all possible present and former lawyers and particularly former lawyers who worked in the AG's office, in order for Plaintiff to locate other attorneys who have first hand information on the corruption on Saipan and the gross incompetence and malfunctioning in the AG's office. As these lawyers are located and as information can be obtained on their documentary holdings, this disclosure statement will be amended to reflect the new information developed.

n. The Filipino and ethnic associations monitor the status of compatriots in the CNMI and have information on allegations of discrimination and corruption in the CNMI as it affects their colleagues. These associations will be contacted for specific information and this statement appropriately amended as necessary.

o. Steve Aver is a paralegal who provided legal assistance primarily on appeal 06-005 GA. He is familiar with this case and its court documents.

p. US Bank and CSC Credit Services has information and documents on Bradshaw's credit situation on or about Mar 15, 2005 when Bradshaw was denied credit.

q. Dr Wade Lachman and Genova Diagnostics Laboratories are familiar with plaintiff's state of health and has documents of his diagnosis. Dr Timothy Bonine has documents on plaintiff's lungs and any question of possible allergies.

r. The other parties cited may have information on CNMI corruption or on

Bradshaw's presence in the US.

4. Plaintiff is prepared to copy any documents now in his possession for the actual cost of copies (which range from 10 cents to 20 cents per page) at a commercial outlet with a copy machine (some are in Couer d'Alene, ID or St Maries, ID) if the other defendants reciprocate for copies at actual cost and the cost of returning postage to parties. If the other defendants want to charge more than actual cost on copies, then plaintiff reserves the right to make the exact same charges to that defendant.

5. Any applicable insurance agreements in force, per rule 34 of the FRCP. There appears to be no insurance agreements in force affecting this case.

6. Anticipated Expert Witnesses. The plaintiff expects to consult/contract with an expert handwriting analyst once the fraudulent postage receipts are supplied to plaintiff. Once plaintiff has the documents and can contact such witness, plaintiff will amend this disclosure statement and advise the parties involved of that witness.

Plaintiff may call a qualified health practitioner to assess plaintiff's health. Once such an expert is decided upon, this disclosure statement will be amended.


DATED THIS 30th day of APRIL 2007.


Robert D. Bradshaw, Plaintiff, Pro Se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30 day of Apr 2007, I caused to be served a true copy of the foregoing document by US Mail Postage Paid to each of the following:

Jay H. Sorensen, c/o Shanghai, PO Box 9022, Warren, MI 48090-9022
CNMI Attorney General, Caller Box 10007, Capitol Hill, Saipan, MP 96950
Mark B. Hanson, PMB 738, PO Box 10,000, Saipan, MP 96950


Robert D. Bradshaw, Plaintiff, Pro Se